

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

FREDERIC LEPPER
Petitioner,

V.

LOIS RUSSO,
Respondent.

Civil Action No. 04-11879-MLW

**JOINT MOTION TO ENLARGE THE TIME
FOR FILING SUPPLEMENTAL MEMORANDA OF LAW**

From the current deadline of June 22, 2007, counsel for the parties in the above captioned petition for writ of habeas corpus respectfully move this Court to enlarge the time for filing supplemental memoranda of law to June 28, 2007.

As grounds therefor, the undersigned attorneys state that they are carrying large caseloads of post-conviction cases with competing deadlines. This has resulted in briefing and litigation demands that have hampered timely compliance with this Court's order of May 22, 2007 requiring supplemental memoranda of law. A brief extension is needed to deal fully with the issues raised by this Court and to file an appropriate response.

WHEREFOR, the parties in the above captioned petition for writ of habeas corpus respectfully move this Court to enlarge the time for filing supplemental memoranda of law to June 28, 2007.

Respectfully submitted,

ATTORNEY FOR THE PETITIONER
/s/ Alan D. Campbell
Alan D. Campbell
BBO No. 634188
P.O. Box 131

2

Brookline, MA 02446
(617) 735-8913

ATTORNEY FOR THE RESPONDENT

MARTHA COAKLEY
ATTORNEY GENERAL

/s/ Annette C. Benedetto
Annette C. Benedetto
Assistant Attorney General
Criminal Bureau
Attorney General's Office
One Ashburton Place,
Boston, MA 02108
(617) 727-2200
BBO No. 037060

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the Electronic Case Filing system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on the date set forth below.

Dated: June 19, 2007

/s/ Annette C. Benedetto
Annette C. Benedetto